

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

CONSERVATION LAW FOUNDATION, INC.,

Plaintiff

V.

Case No. 1:22-cv-10295-AK

PROLIERIZED NEW ENGLAND, LLC;
METALS RECYCLING, L.L.C.; JOINT
VENTURE OPERATIONS, INC.;
PROLIERIDE TRANSPORT SYSTEMS,
INC.; and MAINE METAL RECYCLING,
INC.,

Defendants

JOINT NOTICE REGARDING ENTRY OF CONSENT DECREE

Plaintiff Conservation Law Foundation (“CLF” or “Plaintiff”) and Defendants Prolerized New England, LLC., Metals Recycling, L.L.C., Joint Venture Operations, Inc., Proleride Transport Systems, Inc., and Maine Metal Recycling, Inc. (“Defendants”) (jointly “the Parties”) hereby provide notice that the United States Department of Justice reviewed the Proposed Consent Decree in this action and does not object to its entry by this Court. See Ex. 1 (Letter from U.S. Department of Justice) and its attached Exhibit A (Letters from GreenRoots, Mystic River Watershed Association, the Nipmuc Indian Development Corporation, and the Blackstone River Coalition). In addition, the 45-day review period ended on June 23rd, 2023.

Accordingly, the Parties request that the Court enter the previously filed Consent Decree. ECF No. 25-1 (Consent Decree). The Consent Decree represents a settlement of all claims presented by Plaintiff against the Defendants in this case. The Parties represent that the settlement terms are appropriate, reasonable, and in the public interest.

June 26, 2023

Respectfully submitted,

CONSERVATION LAW FOUNDATION,
INC.

By its attorneys:

/s/ Chelsea E. Kendall

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METALS RECYCLING, L.L.C.;
JOINT VENTURE OPERATIONS, INC.;
PROLERIDE TRANSPORT SYSTEMS,
INC.; and
MAINE METAL RECYCLING, INC.

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CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)

I, as counsel for Plaintiff, hereby certify that I have conferred with counsel for all Defendants on this motion and that Defendants' counsel assented to and supports this motion, which is filed at the request of all parties.

/s/ Chelsea E. Kendall
Chelsea E. Kendall

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2023, the foregoing document was filed through the ECF system, by which means a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Chelsea E. Kendall
Chelsea E. Kendall